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November 23, 2009

VIA ECF (cover only) & BY HAND

The Honorable David G. Trager
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: In re Vitamin C Antitrust Litigation
(06-MD-1738 (DGT) (JO))

Dear Judge Trager:

I represent defendants Jiangsu Jiangshan Pharmaceutical Co., Ltd. ("Jiangshan") and JSPC America, Inc. ("JSPCA") in the above-referenced litigation.

On behalf of defendants Jiangshan; Hebei Welcome Pharmaceutical Co., Ltd.; Northeast Pharmaceutical Group Co., Ltd.; and Shijiazhuang Pharma. Weisheng Pharmaceutical (Shijiazhuang) Co., Ltd., enclosed please find courtesy copies of the following documents:

- Notice of Motion for Defendants' Motion for Summary Judgment or, in the Alternative, for Determination of Foreign Law and Entry of Judgment Pursuant to Rule 44.1, Fed. R. Civ. P.;
- Defendants' Local Rule 56.1 Statement in Support of Their Motion for Summary Judgment;
- Memorandum of Law in Support of Defendants' Motion for Summary Judgment or, in the Alternative, for Determination of Foreign Law and Entry of Judgment Pursuant to Rule 44.1, Fed. R. Civ. P.;
- Declaration of Annabelle Chan in Support of Defendants' Motion for Summary Judgment or, in the Alternative, for Determination of Foreign Law and Entry of Judgment Pursuant to Rule 44.1, Fed. R. Civ. P.;



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- Defendants' Exhibits attached to Declaration of Annabelle Chan in Support of Defendants' Motion for Summary Judgment or, in the Alternative, for Determination of Foreign Law and Entry of Judgment Pursuant to Rule 44.1, Fed. R. Civ. P. and DVD containing same;
- Plaintiffs' Memorandum in Opposition to Defendants' Motion for Summary Judgment or, in the Alternative, for Determination of Foreign Law and Entry of Judgment;
- Plaintiffs' Responses to Defendants' Local Rule 56.1 Statement in Support of Their Motion for Summary Judgment;
- Declaration of Jennifer Milici in Support of Plaintiffs' Memorandum in Opposition to Defendants' Motion For Summary Judgment or, in the Alternative, for Determination of Foreign Law and Entry of Judgment;
- Plaintiffs' Exhibits attached to Declaration of Jennifer Milici in Support of Plaintiffs' Memorandum in Opposition to Defendants' Motion For Summary Judgment or, in the Alternative, for Determination of Foreign Law and Entry of Judgment and DVD containing same;
- Reply Memorandum of Law in Support of Defendants' Motion for Summary Judgment or, in the Alternative, for Determination of Foreign Law and Entry of Judgment Pursuant to Rule 44.1, Fed. R. Civ. P.;
- Declaration of Steven Newmark in Support of Defendants' Motion for Summary Judgment or, in the Alternative, for Determination of Foreign Law and Entry of Judgment Pursuant to Rule 44.1, Fed. R. Civ. P.;
- Defendants' Exhibits to Declaration of Steven Newmark in Support of Defendants' Motion for Summary Judgment or, in the Alternative, for Determination of Foreign Law and Entry of Judgment Pursuant to Rule 44.1, Fed. R. Civ. P.; and
- Statement in *In Re Vitamin C Antitrust Litigation*, 06-MD-1738 (DGT), of the Ministry of Commerce of the People's Republic of China, dated August 31, 2009.



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Further, on behalf of defendant JSPCA, enclosed please find courtesy copies of the following documents:

- Notice of Motion for JSPC America, Inc.'s Motion for Summary Judgment;
- Defendant JSPC America, Inc.'s Local Rule 56.1 Statement in Support of Its Motion for Summary Judgment;
- Defendant JSPC America, Inc.'s Memorandum of Law in Support of Its Motion for Summary Judgment;
- Declaration of Richard S. Goldstein in Support of JSPC America, Inc.'s Motion for Summary Judgment;
- Defendant JSPC America, Inc.'s Exhibits attached to Declaration of Richard S. Goldstein in Support of JSPC America, Inc.'s Motion for Summary Judgment and DVD containing same;
- Plaintiffs' Memorandum in Opposition to Defendant JSPC America, Inc.'s Motion for Summary Judgment;
- Plaintiffs' Responses to Defendant JSPC America, Inc.'s Local Rule 56.1 Statement in Support of Its Motion for Summary Judgment;
- Declaration of Brent W. Landau in Support of Plaintiffs' Opposition to Defendant JSPC America, Inc.'s Motion for Summary Judgment;
- Plaintiffs' Exhibits attached to Declaration of Brent W. Landau in Support of Plaintiffs' Opposition to Defendant JSPC America, Inc.'s Motion for Summary Judgment;
- Defendant JSPC America, Inc.'s Reply Memorandum of Law In Support of Its Motion for Summary Judgment;
- Defendant JSPC America, Inc.'s Responses to Plaintiffs' Statement of Material Facts;



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- Reply Declaration of Richard S. Goldstein In Support of JSPC America, Inc.'s Motion for Summary Judgment; and
- Defendant JSPC America, Inc.'s Exhibit attached to Reply Declaration of Richard S. Goldstein in Support of JSPC America, Inc.'s Motion for Summary Judgment.

We note that certain exhibits to the various declarations have been filed under seal pursuant to the confidentiality order in place in the above-referenced litigation. In some instances, documents filed under seal also have been filed publicly in a redacted form agreed to by Plaintiffs and Defendants. The Court's courtesy copies do, of course, contain all exhibits to all declarations. Those documents contained in the Court's courtesy copies that have been filed under seal bear a legend indicating as much.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Richard S. Goldstein".

Richard S. Goldstein

Enclosures

cc: Counsel on the attached service list (w/o enclosures) (via Email)
The Honorable James Orenstein, U.S. Magistrate Judge (via FedEx)

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